

ORIGINAL

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

IN THE MATTER OF:

Amendment of 47 C.F.R. §73.202(b)
Table of FM Allotments
(De Ridder, Louisiana)

To: The Chief, Allocations Branch
Policy and Rules Division

) MM DOCKET No.

) RM-

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PETITION FOR RULE MAKING

Comes now **Willis Broadcasting Corporation** ("Petitioner"), by Counsel, and pursuant to *Section 1.401* of the Commission's Rules, hereby respectfully petitions the Commission to amend *Section 73.202(b)* of the Rules, FM Table of Allotments, as follows:

<i>Community</i>	<i>Present</i>	<i>Proposed</i>
De Ridder, LA	269A	250A

In support whereof, the following is shown:

Background

1. The Petitioner is the new Licensee of Radio Station KEAZ (FM), De Ridder, Louisiana.¹ Radio Station KEAZ (FM) is presently authorized to operate on Channel 269A. Petitioner seeks to have the Commission amend the FM Table of Allotments to permit substitution of Channel 269A with Channel 250A. This substitution will allow KEAZ (FM) which is currently short spaced to Radio Station KWDX (FM), Silsbee, Texas to operate as a fully spaced maximum Class A facility.

¹See BALH-971212EC

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Compliance With Allocation Rules

2. Attached hereto as ***Exhibit 1***, is the Engineering Statement of Jefferson G. Brock of the Engineering firm of Graham Brock, Inc. As the attached Engineering Statement demonstrates, the proposed substitution of Channel 269A to that of 250A will meet *all* of the spacing requirements set forth in 47 *CFR* §§73.207 and 73.210.

Public Interest Showings

3. *Significant Coverage Gains.* The substitution of Channel 269A with Channel 250A at De Ridder, Louisiana, will enable KEAZ (FM) to be a full Class A facility which will provide a 1 mV/m coverage area of 2,513.0 square kilometers with a population coverage of 53,966 persons.² This represents a *significant* increase in coverage area of approximately 838 square kilometers. Further, the increase shall enable services to more than 7000 additional people.

4. *Preferential Allotment.* The Petitioners proposal will result in a preferential arrangement of allotment consistent with the *Revision of the Assignment Policies and Procedures*, 90 FCC Rcd 88 (1982). The proposal promotes the Commission's goal of enhancing diversity of thought and opinion in the broadcast media, as well as Congress's charge to the Commission to ensure a fair, efficient and equitable distribution of radio services in the United States.³

Statement of Interest in Channel

5. Petitioner hereby states that, should the Commission institute the requested Rule Making proceedings and ultimately adopt the amendment to the FM

²1990 Census, PL 94-171.

³47 U.S.C. §307(b)

Table of Allotments proposed herein, Petitioner will promptly file an application to modify the facilities of KEAZ (FM) to specify operation on Channel 250A.

WHEREFORE, the above premises considered, Petitioner respectfully urges that the Commission INSTITUTE Rule Making proceedings, proposing to AMEND Section 73.202(b) of the Rules, FM Table of Allotments, as follows:

<i>Community</i>	<i>Present</i>	<i>Proposed</i>
De Ridder, LA	269A	250A

Respectfully submitted,

WILLIS BROADCASTING CORPORATION

By: 

John C. Trent

Its Attorney

October 28, 1998

The Law Offices of
Putbrese Hunsaker & Trent, P.C.
100 Carpenter Drive
Suite 100
P.O. Box 217
Sterling VA 20167-0217

Exhibit 1

Technical Exhibit for Radio Station KEAZ (FM)

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

PETITION FOR RULE MAKING
WILLIS BROADCASTING CORPORATION
KEAZ FM RADIO STATION
SUBSTITUTE CH 250A FOR CH 269A
DE RIDDER, LOUISIANA
October 1998

TECHNICAL EXHIBIT

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PETITION FOR RULE MAKING
WILLIS BROADCASTING CORPORATION
KEAZ FM RADIO STATION
SUBSTITUTE CH 250A FOR CH 269A
DE RIDDER, LOUISIANA
October 1998

TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of Willis Broadcasting Corporation ("Willis"), licensee of radio station KEAZ, Channel 269A, De Ridder, Louisiana. Willis requests that §73.202(b) of the Commission's rules be amended by substituting Channel 250A for Channel 269A at De Ridder, Louisiana, and that KEAZ be ordered to change channels.¹

PROPOSAL

2. The allotment of Channel 250A to De Ridder will allow KEAZ to operate as a maximum 6.0 kilowatt 100 meter height above average terrain facility (non-directional) at the existing KEAZ transmitter site. KEAZ is currently prevented from being a maximum Class A facility by a shortspace to station KWDX, Channel 269A, Silsbee, Texas. However, on Channel 250A, KEAZ would be a fully spaced maximum Class A facility.

3. Willis herein requests Channel 250A be allotted to De Ridder, Louisiana, in substitution for Channel 269A at reference coordinates: North Latitude 30° 52' 43" and West Longitude 93° 17' 25". No site restriction from the community is necessary, however, the

1) In 1997, the previous licensee of KEAZ also proposed the substitution of Channel 250A for Channel 269A at De Ridder. However, this proposal has never been acted upon nor has research found any evidence of the proposal in the FCC's files.

coordinates specified are those of the currently authorized KEAZ transmitter site.² From the proposed reference site, Channel 250A can provide a 3.16 mV/m contour to De Ridder, Louisiana. Exhibit #1 is a usable area map for Channel 250A at De Ridder, Louisiana, and visually demonstrates where a transmitter site could be located to be adequately spaced to all other Commission authorized facilities. Exhibit #2 is a §73.207 spacing study from the reference site which demonstrates Channel 250A at De Ridder is fully spaced to all other licensed, applied for or proposed facilities and complies with the Commission's minimum distance separation requirements.³

3. Willis, therefore, requests the following changes be made to the Commission's Table of FM Allotments:

De Ridder, Louisiana

Present	Proposed
221C3, 269A	221C3, 250A

PUBLIC INTEREST ASPECTS

4. The allotment of Channel 250A in substitution for Channel 269A at De Ridder, Louisiana, will enable KEAZ to be a maximum Class A facility providing 1.0 mV/m service to 53,966 persons in 2,513.0 square kilometers. This represents an increase of 7,132 persons in 838.5 square kilometers over its currently licensed facility.⁴

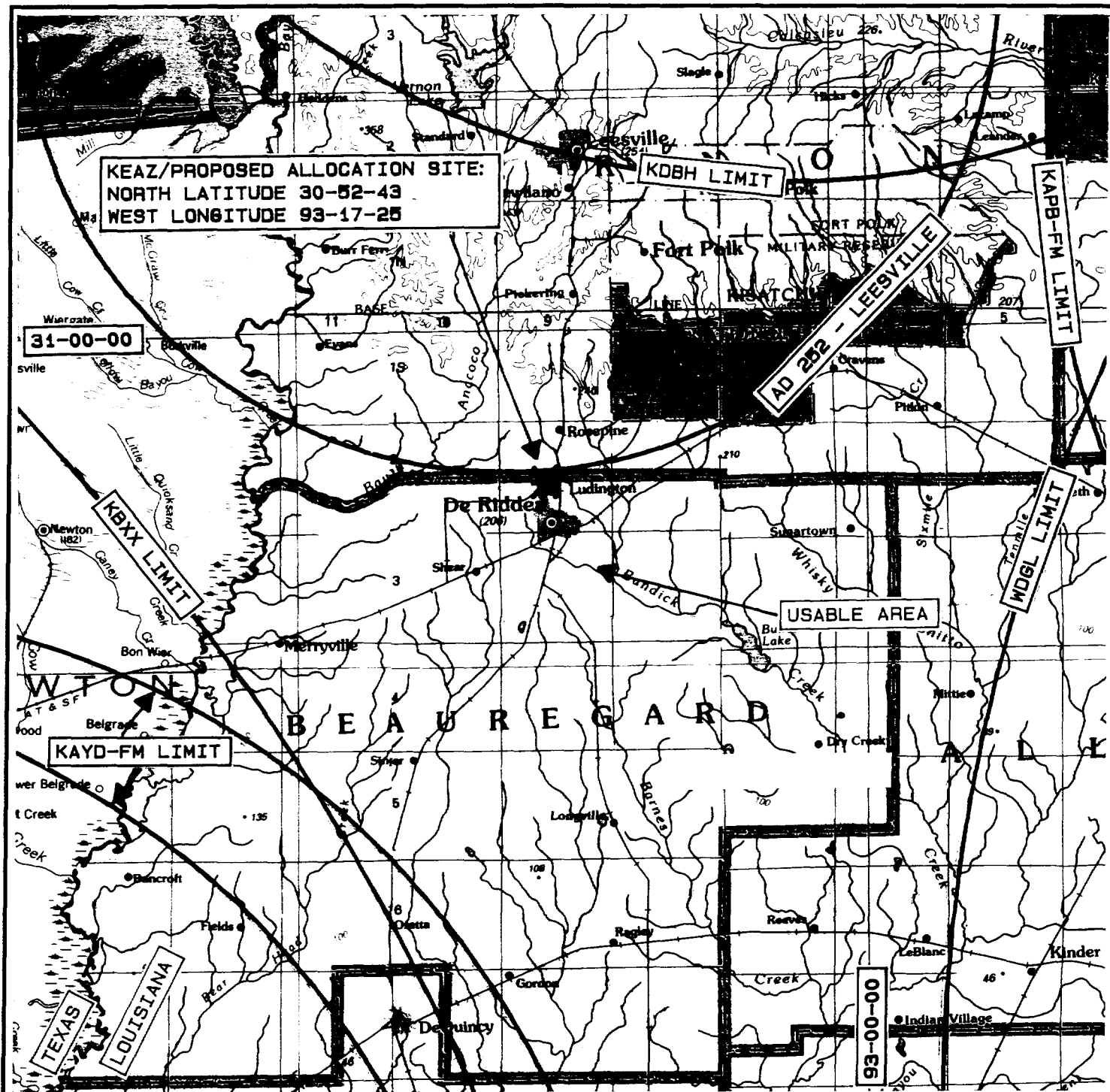
2) This site is located 4.0 kilometers north of the community.

3) See Footnote 2 supra.

4) 1990 Census, PL 94-171 files.

5. Once Channel 250A is allotted to De Ridder, Louisiana, Willis will file, on a timely basis, an application to make minor changes in the facilities of KEAZ to specify operation on Channel 250A. Upon grant of a construction permit, Willis will expeditiously modify the authorized KEAZ facilities.

6. The foregoing technical statement and exhibits were prepared on behalf of Willis Broadcasting Corporation by Graham Brock, Inc., its Technical Consultants. All of the information contained herein is true and accurate to the best of our belief and knowledge. All data relating to this proposal was extracted from the NTIA database as updated on July 17, 1998. We assume no liability for errors or omissions in that database which may be adverse to this proposal.



USABLE AREA CHANNEL 250A

MAP IS A COMPOSITE OF THE 1: 500, 000 SCALE
U.S.G.S. BASE STATE MAPS OF LOUISIANA
AND TEXAS

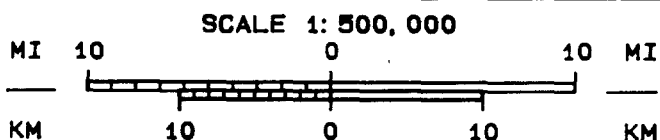


EXHIBIT #1

PETITION FOR RULE MAKING
WILLIS BROADCASTING CORP.
KEAZ FM RADIO STATION
ALLOT CHANNEL 250A
DE RIDDER, LOUISIANA
October 1998

GRAHAM BROCK, INC.
BROADCAST TECHNICAL CONSULTANTS

Graham Brock Inc. - Broadcast Technical Consultants
St. Simons Island GA - Washington DC

ALLOCATION STUDY FOR DE RIDDER, LOUISIANA
USING KEAZ/PROPOSED ALLOCATION SITE FOR REFERENCE

REFERENCE	CLASS A	DISPLAY DATES
30 52 43 N	Current rules spacings	DATA 10-23-98
93 17 25 W	CHANNEL 250 - 97.9 MHz	SEARCH 10-27-98

CALL TYPE	CH# LAT	CITY LNG	STATE FWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD250	250A	De Ridder	LA	0.0	0.00	115.0	-115.00 *
AD	30 52 43	93 17 25	0.000 kW	OM	0.0	71.5	
DeRidder FM Radio, Inc.							
AD252	252C3	Leesville	LA	356.4	42.98	42.0	0.98 <
AD	31 15 56	93 19 07	0.000 kW	OM	26.7	26.1	
Pene Broadcasting Company, In							
RM-9351 980714							
>Site restriction 14.6km North							
>Additional consideration							
KDBH	249A	Natchitoches	LA	12.3	100.42	72.0	28.42
LI CN	31 45 47	93 03 47	3.000 kW	100M	62.4	44.8	
Cane River Communications, In							
BLH-850809KC							
To Channel 247C3 per D91-109							
KBXX	250C	Houston	TX	236.4	257.89	226.0	31.89
LI CN	29 34 34	95 30 36	7.000 kW	311M	160.3	140.5	
Clear Channel Radio Licenses,							
BLH-841229DM							
This license is for an AUXILIARY facility of KBXX, Houston, Tex							
KBXX	250C	Houston	TX	236.4	257.89	226.0	31.89
LI CY	29 34 34	95 30 36	100.000 kW	585M	160.3	140.5	
Clear Channel Radio Licenses,							
BLH-831026AD							
KAYDFM	248C1	Beaumont	TX	218.9	108.62	75.0	33.62
LI CN	30 06 56	94 00 00	100.000 kW	143M	67.5	46.6	
Petracom License Partners, L.							
BLH-860108KB							
To channel 248C							
WDGL	251C	Baton Rouge	LA	105.5	207.11	165.0	42.11
LI CY	30 21 58	91 12 47	100.000 kW	457M	128.7	102.6	
Guaranty Broadcasting Corpora							
BLH-851122KD							
KAYDFM	248C1	Beaumont	TX	221.5	120.39	75.0	45.39
LI CN	30 03 52	94 07 12	50.000 kW	98M	74.8	46.6	
Petracom License Partners, L.							
BMLH-971209KB							
KAPBFM	249A	Marksville	LA	76.4	118.96	72.0	46.96
LI CN	31 07 27	92 04 40	6.000 kW	100M	73.9	44.8	
Three Rivers Radio Company							
BLH-980109KE							

ALLOCATION STUDY CHANNEL 250A

EXHIBIT #2

PETITION FOR RULE MAKING
WILLIS BROADCASTING CORP.
KEAZ FM RADIO STATION
ALLOT CHANNEL 250A
DE RIDDER, LOUISIANA
October 1998

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

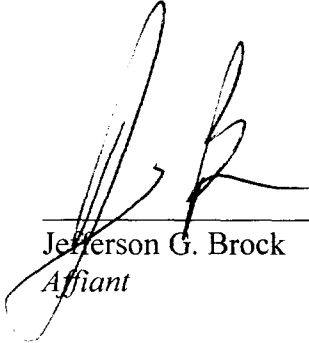
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Willis Broadcasting Corporation, licensee of Radio Station KEAZ, to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

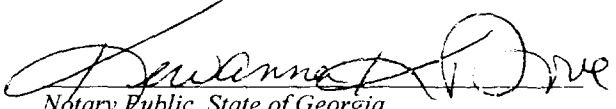
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 27th day of October, 1998.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 27th day of October, 1998*



Notary Public, State of Georgia
My Commission Expires: April 20, 2002